

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17-BK-3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FIVE HUNDRED FIFTY-FIFTH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO TO CLAIMS FOR WHICH THE DEBTOR IS NOT LIABLE

Upon the *Five Hundred Fifty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for which the Debtor Is Not Liable* (the “Five Hundred Fifty-Fifth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth” or “Objecting Debtor”), dated December 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Five Hundred Fifty-

¹ The Debtors in the Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Fifty-Fifth Omnibus Objection.

Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Fifty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Fifty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Fifty-Fifth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which neither the Commonwealth nor any of the other Title III Debtors are liable; and the Court having determined that the relief sought in the Five Hundred Fifty-Fifth Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Fifty-Fifth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Fifty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 23090 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Fifty-Fifth Omnibus Objection

Five Hundred Fifty-Fifth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	COTTO CASTRO, PABLO J. HC 2 BOX 6281 GUAYANILLA, PR 00656-9708	05/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	114498	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón.						
2	CRUZ LAFONTAINE, JUAN M. 15 FIGERAS JAYUYA, PR 00664	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	30885	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón.						
3	CRUZ NUNEZ, FRANCISCO PO BOX 526 BAJADERO, PR 00616-0526	03/14/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	2872	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón.						

Five Hundred Fifty-Fifth Omnibus Objection
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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
4	CRUZ SANCHEZ, RUBEN D. PO BOX 346 ARROYO, PR 00714	06/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	71402	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón.						
5	FAS RAMIREZ, JOSUE URB. MARTY BUZON #3 CABO ROJO, PR 00623	06/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	46281	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, the claimant is not a named plaintiff in either litigation, and there is therefore no basis for the claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations.						
6	FIGUEROA ORTIZ, MARIA D P O BOX 826 YABUCOA, PR 00767	05/16/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	16121	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						

Five Hundred Fifty-Fifth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
7	GONZALEZ ZAYAL, RAFAEL URB. ESTANCIA DEL MAYORAL CALLE COUBERAL BUZON 12106 VILLALBA, PR 00766	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	165332	\$17,000.00*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón.						
8	MONTALVO CASTRO, FERNANDO 1542 AVE MIRAMAR ARECIBO, PR 00612	05/15/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	15477	\$40,000.00*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
9	ORTIZ SANTIAGO, SAMUEL HC 1 BOX 4336 AIBONITO, PR 00705	04/09/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	5390	\$1,072.00*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, the claimant is not a named plaintiff in either litigation, and there is therefore no basis for the claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations.						

Five Hundred Fifty-Fifth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
10	OTANO HERNANDEZ, ANGEL HC 01 BOX 4146 LARES, PR 00669	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24439	\$30,000.00*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón.						
11	PINTO GONZALEZ, ALFREDO 303 CALLE VEREDA DEL PRADO URB. LOS ARBOLES CAROLINA, PR 00987	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	140364	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						
12	QUINONES PINTO, ANGEL G BO LAS DOLORES 263 CALLE COLOMBIA RIO GRANDE, PR 00745	04/02/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	5731	\$85,813.91*
Reason: Claim purports to assert liabilities associated with the litigation captioned Frente Unido de Policías Organizados et al. v. Puerto Rico Police Department, Case No. KAC-2007-4170 ("FUPO"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 161091, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned "FUPO".						

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
13	RIVERA MARRERO, JOSE R URB COUNTRY CLUB 877 CALLE HYPOLIAS SAN JUAN, PR 00924	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	41805	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
Claim #41805 also contained on Exhibit A to the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						
14	ROSARIO COLLAZO, SILVERIO J. RES. FERNANDO LUIS GARCIA EDI. 27 APT. 195 UTUADO, PR 00641	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	33388	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón.						
15	VALENTIN TORRES, JULIO ANGEL URB. RIO CRISTAL C/ ROBERTO COLE 520 MAYAGUEZ, PR 00680	05/15/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	15400	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, the claimant is not a named plaintiff in either litigation, and there is therefore no basis for the claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations.						

Five Hundred Fifty-Fifth Omnibus Objection

Exhibit A - Claims to Be Disallowed

					ASSERTED CLAIM AMOUNT
NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	
16 VAZQUEZ MARTINEZ, MITCHELL CANA DD-1 CALLE 29 BAYAMON, PR 00957	06/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	35228	\$223,200.00*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.					
TOTAL					\$397,085.91*